Air Quality
TIER II OPERATING PERMIT

State of Idaho
Department of Environmental Quality

PERMIT No.: T2-060032
FACILITY ID No.: 027-00067
AQCR: 064 **CLASS:** A
SIC: 2431 **ZONE:** 11
UTM COORDINATE (km): 524..0, 4834.7

1. **PERMITTEE**
Teton Sales Company

2. **PROJECT**
Initial Tier II Operating Permit (OP) - to Fulfill the Requirements in Compliance Plan in Tier I OP Issued November 6, 2002

3. **MAILING ADDRESS**	**CITY**	**STATE**	**ZIP**
P. O. Box 177	Caldwell	ID	83606

4. **FACILITY CONTACT**	**TITLE**	**TELEPHONE**
Diane Puri	General Manager	(208) 459-6334

5. **RESPONSIBLE OFFICIAL**	**TITLE**	**TELEPHONE**
Diane Puri	General Manager	(208) 459-6334

6. **EXACT PLANT LOCATION**	**COUNTY**
518, 604, and 612 Kit Ave., Caldwell	Canyon

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Door and molding surface coating and sales

8. **PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

SHAWNEE CHEN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:	PUBLIC COMMENT
Date Modified/Revised:	
Date Expires:	

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Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
cfm	cubic feet per minute
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gal/hr	gallons per hour
gal/yr	gallons per year
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/day	pound per day
NO_X	nitrogen oxides
NAAQS	national ambient air quality standard
NSPS	New Source Performance Standards
O&M	operations and maintenance
OP	operating permit
OSHA	Occupational Safety and Health Administration
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
SIC	Standard Industrial Classification
TAP	Toxic air pollutant
TSDF	a treatment, storage, and disposal facility
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. TIER II OPERATING PERMIT SCOPE

Purpose

1.1 The application is to fulfill the requirements in Section 7, Compliance Schedule, in Tier I OP issued November 6, 2002, and to include the requirements in 40 CFR 63 Subpart QQQQ.

1.2 This is the facility's initial Tier II operating permit.

Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Emissions sources at the facility, including coating processes, drying ovens, and space heaters	Throughput limits for coating materials
3	Door coating operation at 518 Kit Avenue building	99% efficient polyester filter used to control the particulates. The spray booth utilizes water-based paint to control VOC
4	The Paint and Print Process at 604 Kit Avenue building The White Molding Process at 604 Kit Avenue building	None

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e.,, water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

2.9 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-617.

Reports and Certifications

2.10 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83709
Phone: (208) 373-0550
Fax: (208) 373-0287

Obligation to Comply

2.11 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

2.12 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

Fuel Type

2.13 The heated drying ovens and space heaters shall be fired by natural gas exclusively.

Facility-wide VOC Emissons Limit and Its Monitoring

2.14 The facility-wide VOC emissions shall not exceed 135.5 T/yr based on 12-month rolling average.

40 CFR 63 Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

2.15 What parts of my plant does this subpart cover? (40 CFR 63.4682)

(1) All coating operations as defined in 40 CFR 63.4781;

> 40 CFR 63.4781 *Coating operation* means equipment used to apply cleaning materials to a substrate to prepare it for coating application or to remove dried coating (surface preparation), to apply coating to a substrate (coating application) and to dry or cure the coating after application, or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating or cleaning material is applied and all subsequent points in the affected source where organic HAP emissions from that coating or cleaning material occur. There may be multiple coating operations in an affected source. Coating application with hand-held nonrefillable aerosol containers, touchup markers, or marking pens is not a coating operation for the purposes of this subpart.

(2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

2.16 When do I have to comply with this subpart? (40 CFR 63.4683)

Teton Sales is an existing affected facility as defined in 40 CFR 63.4682.

The date by which you must comply with this subpart is called the compliance date. The compliance date for Teton Sales, an existing affected source, is the date three years after May 28, 2003, (i.e., May 28, 2006) as specified in 40 CFR 63.4683(b).

The compliance date begins the initial compliance period. The initial compliance period begins on May 28, 2006, and ends on the last day of the 12th month following the compliance date (i.e., May 31, 2007) as specified in 40 CFR 63.4750 (see Permit Condition 2.27).

2.17 What emission limits must I meet? (40 CFR 63.4690(b))

Per 40 CFR 63.4690(b), for an existing affected source, you must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in Table 2 to this subpart, which is 1.93 lb HAP/gal solids, determined according to the requirements in 40 CFR63.4751 (see Permit Condition 2.28).

2.18 What are my options for meeting the emission limits? (40 CFR 63.4691)

You must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690 (see Permit Condition 2.17). Teton Sales has chosen to use 40 CFR 63.4691(b) *Emission rate without add-on controls option* as the compliance operation in their application dated June 16, 2006.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690 (see Permit Condition 2.17), calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of 40 CFR 63.4750, 63.4751, and 63.4752 (see Permit Conditions 2.27, 2.28, and 2.29) to demonstrate compliance with the emission limit using this option.

2.19 What operating limits must I meet? (40 CFR 63.4692)

(a) For any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any operating limits.

2.20 What work practice standards must I meet? (40 CFR 63.4693)

(a) For any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any work practice standards.

2.21 What are my general requirements for complying with this subpart? (40 CFR 63.4700)

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) of 40 CFR 63.4700.

(1) Any coating operation(s) for which you use the emission rate without add-on controls option, as specified in §63.4691(b) (see Permit Condition 2.18(b)), must be in compliance with the applicable emission limit in §63.4690 (see Permit Condition 2.17) at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

2.22 What parts of the General Provisions apply to me? (40 CFR 63.4701)

Table 4 to this subpart indicates which parts of the General Provisions in §§63.1 through 63.15 apply to you.

2.23 What notifications must I submit? (40 CFR 63.4710)

(a) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of 40 CFR 63.4710.

(b) *Initial Notification.* For an existing affected source, you must submit the Initial Notification no later than 120 days after May 28, 2003.

(c) *Notification of Compliance Status.* You must submit the Notification of Compliance Status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4750 (i.e., May 31, 2007) that applies to your affected source. The Notification of Compliance Status must contain the information specified in paragraphs (c)(1) through (9) of 40 CFR 63.4710 and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4750 (i.e., May 28, 2006 through May 31, 2007) that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.4691 (see Permit Condition 2.18) that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.4690 (see Permit Condition 2.17), include all the calculations you used to determine the grams organic HAP emitted per liter of coating solids used (pounds (lb) organic HAP emitted per gallon of coating solids used). You do not need to submit information provided by the materials suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data can include a copy of the information provided by the supplier or manufacturer of the example coating or material or a summary of the results of testing conducted according to §63.4741(a), or (b). (see Permit Conditions 2.28(a), or 2.28(b)). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4751 (see Permit Condition 2.28).

(8) The calculation of grams organic HAP emitted per liter coating solids used (lb organic HAP emitted per gallon coating solids used) for the compliance option(s) you used, as specified in paragraphs (c)(8)(ii) of 40 CFR 63.4710.

(i) This requirement doesn't apply to the permittee.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate, using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4751 (see Permit Condition 2.28).

2.24 <u>What reports must I submit? (40 CFR 63.4720)</u>

(a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of 40 CFR 63.4720.

(1) *Dates.* Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of 40 CFR 63.4720. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4750 (i.e., begins on June 1, 2007)

(see Permit Condition 2.27) that applies to your affected source and ends on June 30 or December 31, whichever occurs first following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.4691 (see Permit Condition 2.18) that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.

(v) If you used the emission rate without add-on controls (§63.4691(b) (see Permit Condition 2.18(b)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.4690 (see Permit Condition 2.17) that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

(5) This requirement doesn't apply to the permittee.

(6) *Deviations: emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4690 (see Permit Condition 2.17), the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4690 (see Permit Condition 2.17).

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in §63.4751 (see Permit Condition 2.28); and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4) (see Permit Condition 2.28(e)(4)). You do not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

(7) This requirement doesn't apply to the permittee.

2.25 What records must I keep? (40 CFR 63.4730)

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.

(2) This requirement doesn't apply to the permittee.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 of §63.4751 (see Permit Condition 2.28); and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4) (see Permit Condition 2.28(e)(4)); the calculation of the total volume of coating solids used each month, using Equation 2 of §63.4751 (see Permit Condition 2.28); and the calculation of each 12-month organic HAP emission rate, using Equation 3 of §63.4751 (see Permit Condition 2.28).

(4) This requirement doesn't apply to the permittee.

(d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
(e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner and cleaning material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.4751 (see Permit Condition 2.28) for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4751(e)(4) (see Permit Condition 2.28(e)(4)), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4751 (see Permit Condition 2.28); a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4751 (see Permit Condition 2.28).

(3) The methodology used in accordance with §63.4751(e)(4) (see Permit Condition 2.28(e)(4)) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(i) [Reserved]

(j) You must keep records of the date, time, and duration of each deviation.

2.26 In what form and for how long must I keep my records? (40 CFR 63.4731)

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You may keep the records off-site for the remaining three years.

2.27 By what date must I conduct the initial compliance demonstration? (40 CFR 63.4750)

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4751 (see Permit Condition 2.28). The initial compliance period begins on the applicable compliance date specified in §63.4683 (see Permit Condition 2.16) (i.e., May 28, 2006) and ends on the last day of the 12th month following the compliance date (i.e., May 31, 2007). If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to §63.4751 (see Permit Condition 2.28) and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4690 (see Permit Condition 2.17).

2.28 How do I demonstrate initial compliance with the emission limitations? (40 CFR 63.4751)

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.4690 (see Permit Condition 2.17). Any coating operation for which you use the emission rate without add-on controls option is not required to meet the operating limits or work practice standards required in §§63.4692 and 63.4693 (see Permit Conditions 2.19 and 2.20), respectively. You must meet all the requirements of this section to demonstrate initial compliance with the applicable emission limit in §63.4690 (see Permit Condition 2.20) for the coating operation(s). When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which you use the emission rate without add-on controls option.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month according to the requirements in §63.4741(a), that is:

§63.4741 (a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

§63.4741 (a) (1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator.

§63.4741 (a) (1) (i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.,* 0.379178412 truncates to 0.3791).

§63.4741 (a) (1) (ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.,* 0.763).

§63.4741 (a) (2) *Method 24 (appendix A to 40 CFR part 60).* For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. (Note: Method 24 is not appropriate for those coatings with a water content that would result in an effective detection limit greater than the applicable emission limit.)

§63.4741 (a) (3) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

§63.4741 (a) (4) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

§63.4741 (a) (5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 5 or Table 6 to

this subpart. If you use the tables, you must use the values in Table 5 for all solvent blends that match Table 5 entries, and you may only use Table 6 if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 and you only know whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (40 CFR part 63, appendix A) test indicate higher values than those listed on Table 5 or Table 6 (see Permit Conditions 2.30 and 2.31) to this subpart, the Method 311 results will take precedence.

(b) *Determine the volume fraction of coating solids for each coating.* Determine the volume fraction of coating solids for each coating used during each month according to the requirements in §63.4741(b), that is:

§63.4741 (b) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each coating used during the compliance period by one of the methods specified in paragraph (b)(1), (2), or (3) of this section.

§63.4741 (b) (1) *ASTM Method D2697–86 (Reapproved 1998) or D6093–97.* You may use ASTM Method D2697–86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings' (incorporated by reference, see §63.14), or D6093–97, "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If these values cannot be determined using these methods, the owner operator may submit an alternative technique for determining their values for approval by the Administrator.

§63.4741 (b) (2) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

§63.4741 (b) (3) *Calculation of volume fraction of coating solids.* If the volume fraction of coating solids cannot be determined using the options in paragraphs (b)(1) and (2) of this section, you must determine it using Equation 1 of this section:

$$V_s = 1 - \left(\frac{m_{volatiles}}{D_{avg}} \right) \qquad \text{(Eq. 1)}$$

Where:
V_s = Volume fraction of coating solids, liters coating solids per liter coating.
$m_{volatiles}$ = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.
D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

(c) *Determine the density of each material.* Determine the density of each coating, thinner, and cleaning material used during each month from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data

for pure materials. If there is disagreement between ASTM Method D1475–90 test results and such other information sources, the test results will take precedence.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner, and cleaning material used during each month by measurement or usage records.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate it using Equation 1 of this section.

$$H_e = A + B + C - R_w \qquad \text{(Eq. 1)}$$

Where:
H_e = Total mass of organic HAP emissions during the month, grams.
A = Total mass of organic HAP in the coatings used during the month, grams, as calculated in Equation 1A of this section.
B = Total mass of organic HAP in the thinners used during the month, grams, as calculated in Equation 1B of this section.
C = Total mass of organic HAP in the cleaning materials used during the month, grams, as calculated in Equation 1C of this section.
R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, grams, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R_w if you do not wish to use this allowance.)
(1) Calculate the mass of organic HAP in the coatings used during the month, using Equation 1A of this section:

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i}) \qquad \text{(Eq. 1A)}$$

Where:
A = Total mass of organic HAP in the coatings used during the month, grams.
$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.
$D_{c,i}$ = Density of coating, i, grams coating per liter coating.
$W_{c,i}$ = Mass fraction of organic HAP in coating, i, grams organic HAP per gram coating.
m = Number of different coatings used during the month.

(2) Calculate the mass of organic HAP in the thinners used during the month, using Equation 1B of this section:

$$B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad \text{(Eq. 1B)}$$

Where:
B = Total mass of organic HAP in the thinners used during the month, grams.
$Vol_{t,j}$ = Total volume of thinner, j, used during the month, liters.
$D_{t,j}$ = Density of thinner, j, grams per liter.
$W_{t,j}$ = Mass fraction of organic HAP in thinner, j, grams organic HAP per gram thinner.
n = Number of different thinners used during the month.

(3) Calculate the mass of organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C=\sum_{k=1}^{p}\left(Vol_{s,k}\right)\left(D_{s,k}\right)\left(W_{s,k}\right) \qquad \text{(Eq. 1C)}$$

Where:
C = Total mass of organic HAP in the cleaning materials used during the month, grams.
$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.
$D_{s,k}$ = Density of cleaning material, k, grams per liter.
$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, grams organic HAP per gram material.
p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine it according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may include in the determination only waste materials that are generated by coating operations for which you use Equation 1 of this section and that will be treated or disposed of by a facility regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You may use any reasonable methodology to determine the amount of waste materials and the total mass of organic HAP they contain, and you must document your methodology as required in §63.4730(h) (see Permit Condition 2.25(h)). To the extent that waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i-1}^{m}\left(Vol_{c,i}\right)\left(V_{s,i}\right) \qquad \text{(Eq. 2)}$$

Where:
V_{st} = Total volume of coating solids used during the month, liters.
$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.
$V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.4741(b).
m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} V_{st}} \qquad \text{(Eq. 3)}$$

Where:
H_{yr} = Organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids.
H_e = Total mass of organic HAP emissions, grams, from all materials used during month, y, as calculated by Equation 1 of this section.
V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.
y = Identifier for months.

(h) *Compliance demonstration.* The organic HAP emission rate for the initial 12-month compliance period, calculated using Equation 3 of this section, must be less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.27). You must keep all records as required by §§63.4730 and 63.4731 (see Permit Conditions 2.25 and 2.26). As part of the Notification of Compliance Status required by §63.4710 (see Permit Condition 2.23), you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4690 Permit Condition 2.17, determined according to this section.

2.29 <u>How do I demonstrate continuous compliance with the emission limitations? (40 CFR 63.4752)</u>

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of §63.4751 (see Permit Condition 2.28), must be less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.17). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4750 (see Permit Condition 2.27) is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.4751(a) through (g) (see Permit Condition 2.28(a) through (g)) on a monthly basis using data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4690 (see Permit Condition 2.17), this is a deviation from the emission limitations for that compliance period and must be reported as specified in §§63.4710(c)(6) and 63.4720(a)(6) (see Permit Conditions 2.23(c)(6) and 2.24(a)(6)).

(c) As part of each semiannual compliance report required by §63.4720 (see Permit Condition 2.24), you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.17), determined according to §63.4751(a) through (g) (see Permit Conditions 2.28(a) through (g)).

(d) You must maintain records as specified in §§63.4730 and 63.4731 (see Permit Conditions 2.25 and 2.26).

2.30 Table 5 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Solvents and ` Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene.....	108-88-3	1.0	Toluene.
2. Xylene(s).....	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane.....	110-54-3	0.5	n-hexane.
4. n-Hexane.....	110-54-3	1.0	n-hexane.
5. Ethylbenzene.....	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140.....		0	None.
7. Aromatic 100.....		0.02	1% xylene, 1% cumene.
8. Aromatic 150.....		0.09	Naphthalene.
9. Aromatic naphtha.....	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent.....	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits.....	8032-32-4	0	None.
12. Ligroines (VM & P).....	8032-32-4	0	None.
13. Lactol spirits.....	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit.....	64742-82-1	0	None.
15. Mineral spirits.....	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha.....	64742-48-9	0	None.
17. Hydrotreated light distillate.....	64742-47-8	0.001	Toluene.
18. Stoddard solvent.....	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha.....	64742-95-6	0.05	Xylenes.
20. Varsol ® solvent.....	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha.....	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture.....	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

2.31 Table 6 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups\a\

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic \b\.....	0.03	1% xylene, 1% toluene, and 1% ethylbenzene.
Aromatic \c\.....	0.06	4% xylene, 1% toluene, and 1% ethylbenzene.

\a\ Use this table only if the solvent blend does not match any of the solvent blends in Table 5 to this subpart and you only know whether the blend is aliphatic or aromatic.

\b\ E.g., Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

\c\ E.g., Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

3. DOOR COATING OPERATION AT 518 KIT AVENUE

3.1 Process Description

Doors are hand attached to hangers that are mechanically conveyed along a suspended rail past the spray booth where workers spray coat the doors with hand-held, air-assisted airless spray guns. The airless spray guns have a total maximum throughput capacity of 75 gallons per hour. After coating, the doors are routed through a heated drying oven, which is a paneled, ventilated enclosure with natural gas-fired heaters (560,000 Btu per hour total heat input). The oven ventilation system consists of an exhaust blower operating at 5,000 cubic feet per minute (cfm). After passing through the oven, each door is removed from its hanger. There are also three 100,000 Btu per hour natural gas-fired heaters used as space heaters for heating the building at 518 Kit Avenue.

The spray booth is a wide, ventilated booth that draws air past the spraying activity through a 99% efficient polyester filter. The air is discharged outside the building at a rate of 25,000 cfm through a roof vent. The filtration system controls particulate matter emissions, but VOC emissions are uncontrolled. The spray booth utilizes water-based paint to tremendously reduce the VOC, HAP and TAP emitted to the ambient air.

3.2 Emission Control Description

The spray booth is a wide, ventilated enclosure that draws air past the spraying activity through a fiberglass particulate filter. The paint booth air is exhausted through a roof vent at a rate of 25,000 cfm. In addition, the spray booth utilizes water-based paint to tremendously reduce the VOC, HAP, and TAP emitted to the ambient air.

There is no emissions control on the heated drying oven and space heaters.

Table 3.1 DOOR COATING OPERATION DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Spray booth	99% efficient polyester filter to control PM; Utilizing water-based paint to reduce VOC, HAPs/TAPs	Spray booth stack/roof vent
Heated drying oven	none	Building exhaust blower
Space heaters	none	Space heater stacks

Emissions Limits

3.3 Emission Limits

3.3.1 The PM_{10} emissions from the spray booth stack shall not exceed 0.58 lb/hr based on a calendar day average.

3.3.2 The PM_{10} emissions from the spray booth stack shall not exceed 1.28 T/yr based on a calendar year average.

3.3.3 The Calcium Carbonate emissions from the door operation shall not exceed 713.3 lb/day based on a calendar day average.

3.3.4 The Quartz emissions from the door operation shall not exceed 5.52 lb/day based on a calendar day average.

3.3.5 The permittee shall comply with the facility-wide VOC emissions limit specified in Permit Condition 2.14.

Operating Requirements

3.4 Throughput Limits

3.4.1 Daily Throughput Limits

- The throughput of water reducible lacquer shall not exceed 9 gal/hr based on a calendar day average period.
- The throughput of millwork primer shall not exceed 9 gal/hr based on calendar day average period.

3.4.2 Annual Throughput Limits

- The throughput of water reducible lacquer shall not exceed 39,600 gal/yr based on rolling 12-month average period.
- The throughput of millwork primer shall not exceed 39,600 gal/yr based on rolling 12-month average period.

3.5 Operations and Maintenance (O&M) Manual Requirements

3.5.1 The permittee shall have developed an O&M manual for the door-coating spray booth particulate matter filtration system that describes the procedures that will be followed to comply with Permit Conditions 3.3.1 and 3.3.2. The O&M manual shall include, but not be limited to, the following:

- A general description of the spray booth and its ventilation system,
- Normal operating conditions and procedures,
- The appropriate pressure drop operating range as determined by Permit Condition 3.5.2,
- Particulate matter filter manufacturer documentation verifying a minimum capture efficiency of 99%,
- Maintenance procedures, and
- Corrective action procedures.

Particulate matter filter vendor documentation shall be kept with and shall be a part of the O&M manual.

3.5.2 Spray Booth Filtration System Pressure Drop Operating Range

The permittee shall have determined the appropriate pressure drop operating range for the spray booth filtration system based on the systems physical characteristics, the air flow rate through the system, and the particulate matter filter manufacturer specifications and recommendations. These data shall be incorporated into the O&M manual required by Permit Condition 3.5.1. The pressure drop across the filtration system shall be maintained within this range when in operation.

3.5.3 The permittee shall operate spray booth filtration system in accordance with the O&M manual.

3.5.4 The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.5.5 The permittee shall have submitted a copy of the O&M manual to DEQ at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

Monitoring and Recordkeeping Requirements

3.6 Throughput Monitoring Requirement

3.6.1 Monitoring Daily Throughputs

For water reducible lacquer and millwork primer, respectively:

- When the door coating line is in operation, the permittee shall record, in gallons per day, the amount of coating applied in the door coating line.

- When the door coating line is in operation, the permittee shall record, in hours per day, the daily hours of operation of the door coating line.

The permittee shall then calculate and record the average gallons per hour of coatings applied over a calendar day average period by dividing the hours of operation into the gallons applied.

3.6.2 Monitoring Requirement for Annual Throughputs

For water reducible lacquer and millwork primer, respectively:

Monthly, the permittee shall record the amount of coatings, in gallons per month, purchased in the previous month; and the permittee shall then calculate and record, on a 12-month rolling basis, the amount of coatings purchased in the previous 12-month period. The permittee shall keep on site all coating purchase records.

3.7 Monitoring Filtration System Pressure Drop

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the door-coating spray booth filtration system. The pressure differential shall be recorded once per day while the spray paint booth is operating.

3.8 Recordkeeping Requirements

Records required in Permit Conditions 3.6 and 3.7 shall remain on site for the most recent five years, and shall be made available to DEQ representatives upon request.

4. MOLDING COATING PROCESSES AT 604 KIT AVENUE

4.1 Process Description

4.1.1 The Paint and Print Process

When the Paint and Print process is operating, molding is conveyed through roll coater No.1 which rolls a high solids sealer onto the molding. The molding is then sent to the oven for drying. There are no PM emissions from roll coater No.1 and other emissions are drawn out of the building by a nearby 5,000 cfm wall vent. From the oven, the molding passes through one of two buffers which are considered insignificant activities (IDAPA 58.01.01.317.01.a.i.(49)). The molding then passes through fan coater No.1 which discharges a fan-shaped curtain of brown basecoat over the molding. There are no PM emissions from any of the fan coaters and VOC, HAP and TAP emissions are captured by a ventilation hood and vented through the wall or the roof. The molding then enters the oven for drying before it is routed through one of two printers which can be shuffled on and off line depending on the type of molding being patterned, if any. The printers imprint a wood grain pattern such as oak or pine onto the molding. There are no PM emissions from either of the two printers and VOC, HAP and TAP emissions are captured by a ventilation hood and vented through the wall vent. The molding then passes through fan coater No.3 which applies a satin lacquer topcoat to the molding.

After proper coating and printing, the molding is routed through a heated drying oven, which is a paneled, ventilated enclosure with four natural gas-fired heaters (560,000 Btu per hour total heat input). There are also two 100,000 Btu per hour natural gas-fired heaters used as space heaters for heating the building at 604 Kit Avenue. The oven ventilation system consists of an exhaust blower operating at 5,000 cfm.

Molding coating equipment for the Paint and Print Process consists of:

-Roll Coater No.1
-Fan Coater No.1
-Fan Coater No.3
-Printer No.1 and Printer No.2
-Two Buffers

4.1.2 The White Molding process

When the White Molding process is operating, molding is conveyed through roll coater No.1 and then enters the oven for drying. From the oven, the molding passes through one of two buffers and is then conveyed through fan coater No.4 which applies a layer of white basecoat onto the molding. The molding passes through the oven for additional drying before being coated by another layer of white basecoat from fan coater No.2. After proper coating, the molding is routed again through the drying oven.

Molding coating equipment for the White Molding Process consists of:

-Roll Coater No.1
-Fan Coater No.2
-Fan Coater No.4

4.1.3 Only one of the two molding coating processes can run at a time due to the equipment configuration in 604 Kit Avenue building. Fan coaters No.1 and No.4 are in parallel along with fan coaters No.2 and No.3, and therefore are unable to operate simultaneously.

4.1.4 Three coating process wall vent stacks were modeled at a height of 23 feet to take into account the proposed wall vent stacks height increases. The flowrate of each coating process wall vent stack was modeled at 5,000 actual cubic feet per minute (acfm).

4.1.5 There is a paint mix area in the building at 604 Kit Avenue.

4.2 Emission Control Description

There is no emissions control on the molding coating operation, heated drying oven, and space heaters.

Table 4.1 MOLDING COATING PROCESSES DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Molding coating processes	None	Three wall vent stacks
Heated drying oven	None	The building exhaust blower
Space heater	None	Space heater stacks

Emissions Limits

4.3 Emission Limits

4.3.1 The Toluene emissions from the coating processes at 604 Kit Avenue building shall not exceed 765.6 lb/day based on a calendar day average.

4.2.2 The permittee shall comply with the facility-wide VOC emissions specified in Permit Condition 2.14.

Operating Requirements

4.4 Stack Height for Three Coating Processes Venting Stacks

Within 60 days of permit issuance, the permittee shall have extended the stack height to 23 feet for each of the three coating processes venting stacks.

4.5 Coating Materials Throughput Limits

The throughput of each coating material used in the building at 604 Kit Avenue shall not exceed any corresponding limit listed in Table 4.2.

Table 4.2 THROUGHPUT LIMIT FOR COATING MATERIALS

Coating material (coating/thinner)	Daily limit (gal/day)	Annual limit (gal/yr)
Fan coater No.1- brown basecoat	48	8,800
Fan coater No.4- white basecoat	105.6	19,360
Fan coater No.2- white basecoat	76.8	14,080
Fan coater No.3- topcoat	24	4,400
Roll coater No.1- burnishing sealer	16.8	3,080
Printers- colored ink paste	19.2	3,520
T-6 Thinner	136.8	25,080
Glycol ether	na[a]	65

[a] Not applicable. Daily limit is for meeting Toluene emissions limit only.

Monitoring and Recordkeeping Requirements

4.6 Coating Materials (Coating/Thinner) Throughput Monitoring

4.6.1 Monitoring Daily Throughput

The permittee shall record the daily throughput of each coating material that has throughput limit(s) listed in Table 4.2.

4.6.2 Monitoring Annual Throughput

Monthly, the permittee shall record monthly the amount of coatings, in gallons per month, purchased in the previous month; and the permittee shall then calculate and record, on a 12-month rolling basis, the amount of coatings purchased in the previous 12-month period. The permittee shall keep on site all coating purchase records.

4.7 Recordkeeping Requirements

Records required in Permit Condition 4.6 shall remain on site for the most recent five years period, and shall be made available to DEQ representatives upon request.

5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emission rate limits required by this permit.

Table 5.1 SUMMARY OF EMISSION RATE LIMITS

Facility, Location **Emission Limits[a] – Hourly (lb/hr), daily (lb/day), and Annual[b] (T/yr)**							
Source Description	**PM_{10}[c]**		**VOC**	**Organic HAP**	**Calcium Carbonate**	**Quartz**	**Toluene**
	lb/hr, 24-hr avg.	**T/yr**	**T/yr**	**lb HAP/gal solids**	**lb/day**	**lb/day**	**lb/day**
Door coating operation at 518 kit avenue building	0.58	1.28			713.3	5.52	
Molding coating processes at 604 kit avenue building							765.6
Affected sources specified in Permit Condition 2.15				1.93			
Facility-wide			135.5				

[a] As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] Includes condensibles

6. TIER II PERMIT TO OPERATE GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.405, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.406, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

   a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

   b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

   d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Performance Testing

5. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

6. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.405, 5/1/94]

Excess Emissions

7. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

8. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

9. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

10. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Expiration and Renewal

11. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.

[IDAPA 58.01.01.209.04, 7/1/02]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.404.05.

[IDAPA 58.01.01.404.05, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.